

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SAMAAD BISHOP, IN PROPRIA PERSONA,

Case #04 CV 9403

Plaintiffs,

-against-

TOYS "R" US-NY, LLC,  
METRO ONE LOSS PREVENTION GROUP  
(GUARD DIVISION NY), INC.,  
MICHAEL MCDANIEL, IN HIS INDIVIDUAL  
AND OFFICIAL CAPACITY AS SECURITY  
GUARD, GREGORY D. HOUSE IN HIS  
INDIVIDUAL AND OFFICIAL CAPACITY AS  
SALES AND SERVICE MANAGER, AND  
JOSE NIEVES IN HIS INDIVIDUAL AND  
OFFICIAL CAPACITY AS STORE DIRECTOR,

Defendants.

-----X

**DEFENDANTS' ANSWER**  
**TO CROSS CLAIMS**  
**OF CO-DEFENDANTS**  
**METRO ONE and**  
**MICHAEL McDANIEL**

**S I R S:**

**PLEASE TAKE NOTICE**, that defendant, **TOYS "R" US-NY, LLC, GREGORY D. HOUSE, and JOSE NIEVES**, by its attorneys, McAndrew, Conboy & Prisco, pursuant to Rule 13(g) set forth the following as and for their Answer to the Cross Claims of the co-defendants, Metro One Loss Prevention Group and Michael McDaniel:

1. Denies each and every allegation contained in the First Cross Claim.
2. Denies each and every allegation contained in the Second Cross Claim.
3. Denies each and every allegation contained in the Third Cross Claim.
4. Denies each and every allegation contained in the Fourth Cross Claim.
5. Denies each and every allegation contained in the Fifth Cross Claim.

The signature certifies that to the best of the certifier's knowledge the statements in this paper are correct.

Dated: Woodbury, New York  
March 28, 2005

Yours, etc.,

**McANDREW, CONBOY & PRISCO**  
Attorneys for Defendant

By: \_\_\_\_\_  
PETER G. PRISCO (PP 7397)  
Office and P.O. Address  
95 Froehlich Farm Blvd.  
Woodbury, New York 11797  
(516) 921-8600

TO: SAMAAD BISHOP  
Plaintiff Pro Se  
755 White Plains Road  
Apt. No. 20D  
Bronx, New York 10473  
718-861-6645

MORRIS DUFFY ALONSO & FALEY  
Attorneys for Defendants  
METRO ONE LOSS PREVENTION GROUP, INC.  
and MICHAEL McDANIEL  
Two Rector Street  
New York, New York 10006  
(212) 766-1888

STATE OF NEW YORK )

) ss.:  
COUNTY OF NASSAU )

NANCY ORLANDO, being duly sworn, deposes and says:

That deponent is not a party to this action, is over 18 years of age, and resides at Nassau County, New York

That on March 2005, deponent served the within  
DEFENDANTS' ANSWER TO CROSS CLAIM OF CODEFENDANTS METRO ONE  
AND MICHAEL McDANIEL  
by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office or  
official depository of the United States Postal Service within the State of New York,  
addressed to the last known address of the addressee(s) as indicated below:

TO: SAMAAD BISHOP  
Plaintiff Pro Se  
755 White Plains Road  
Bronx, New York 10473  
718-861-6645

MORRIS DUFFY ALONSO & FALEY  
Attorneys for Defendants  
METRO ONE LOSS PREVENTION GROUP, INC.  
and MICHAEL McDANIEL  
Two Rector Street  
New York, New York 10006  
(212) 766-1888

---

NANCY ORLANDO

Sworn to before me this  
March 2005

---

Notary Public  
*Joanne Reller*  
*Notary Public, State of New York*  
*No.: 01RE5046281*  
*Qualified in Suffolk County*  
*Commission Expires: 7/10/07*